

**IN THE UNITED STATES DISTRICT COURT OF MARYLAND  
FOR BALTIMORE**

**WILLIAM B. HARRIS, II**

PLAINTIFF

Vs.

**HOUSING AUTHORITY OF BALTIMORE CITY**

DEFENDANT

CIVIL CASE 14-03395

**PLAINTIFF'S LIMITED OBJECTION TO DEFENDANT'S  
MOTION TO MODIFY HEARING DATE**

**NOW COMES**, William B. Harris, II, (the "Plaintiff"), by his undersigned counsel, and files this Limited Objection to Defendant's Motion to Modify Hearing Date (the "Motion"), and for reasons state:

1. Plaintiff has no objection to the Defendant's Motion. Plaintiff's objects to the Defendant's request for the Court to re-set the hearing prior to November 30, 2016. ***Motion ¶3***

2. The Defendant argues, that it is has been prejudiced and that extending the hearing date beyond November 30, 2016, unnecessarily increases Defendant's cost to defend this case. ***Motion ¶4***

3. The Defendant's Motion fails to demonstrate prejudice with any level of particularity, thus the relief sought should be denied in part. See Fed. R. Civ. P. 7(b)

4. This Court has ordered that the parties conclude discovery. The parties are in fact, in the process of selecting deposition dates, as the Court can glean from the Defendant's Motion Exhibit B.

5. Plaintiff is available on **December 1, 2016**, from **9:00 a.m. to 11:30 a.m.**  
**December 2, 2016, December 5, 2016, December 6, 2016, December 8, 2016 or December 9,**  
**2016.**

WHEREFORE, Plaintiff respectfully request that the Defendant's Motion to Modify Hearing Granted in Part, Denied in Part, as to their request to move the Hearing to an earlier date.

Respectfully Submitted,

/s/ Kim Parker /s/

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Counsel to Plaintiff

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>th</sup> day of September, 2016, a copy of Plaintiff's Limited Objection was served, by the Court's ECF filing system, on Counsel for the Defendant.

/s/ Kim Parker /s/

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Kim Parker, Esquire